

Ann-Martha Andrews  
ann.andrews@ogletree.com  
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
Wells Fargo Tower, Suite 1500  
3800 Howard Hughes Parkway  
Las Vegas, NV 89169  
Telephone: 602-778-3700  
Facsimile: 602-778-3750

*Attorneys for Plaintiff Life Insurance Company of the Southwest*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

LIFE INSURANCE COMPANY OF THE  
SOUTHWEST,

Case No.: 2:22-cv-00036-JCM-NJK

**Plaintiff,**

V.

JESSICA N. ZIMMERMAN,

**Defendant.**

## **STIPULATION FOR ENTRY OF FINAL JUDGMENT**

Plaintiff Life Insurance Company of the Southwest (“LSW”) and defendant Jessica N. Zimmerman hereby stipulate and jointly move for entry of final judgment in this matter in the form attached hereto as Exhibit A.

More specifically, the parties stipulate as follows:

1. LSW filed its Complaint on January 7, 2022. (Doc. 1.) The Summons and Complaint were duly served on Zimmerman on or about February 6, 2022. (Doc. 6.) Zimmerman filed her Answer on March 15, 2022. (Doc. 7.)

2. On December 16, 2019, Zimmerman completed and signed an application for the issuance of an individual term life insurance policy with LSW. LSW thereafter issued Policy No.

720335900 ("the Policy") to Zimmerman. The Policy's Date of Issue was January 7, 2020. The Face Amount of the Policy was \$500,000.

3. In its Complaint, LSW alleged that Zimmerman's answers to Part J, Questions 4 and 6.f. of the Policy application contained misstatements and/or omissions of fact, that LSW relied on the truthfulness of Zimmerman's answers in the policy application in issuing the Policy, and that LSW was entitled to rescission under Nev. Rev. Stat. § 687B.110.

4. Zimmerman hereby stipulates that LSW is entitled to rescind the Policy.

5. LSW has tendered to Zimmerman a refund all premiums paid for the Policy, with interest.

6. The parties jointly stipulate and request the Court to enter judgment in favor of LSW and against Zimmerman that the Policy is rescinded and that coverage under the Policy is void ab initio, as set forth in Exhibit A.

7. Each party will bear its own attorneys' fees and costs of suit.

Date: May 13, 2022

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

/s/ Ann-Martha Andrews  
Ann-Martha Andrews  
ann.andrews@ogletree.com  
Wells Fargo Tower, Suite 1500  
3800 Howard Hughes Parkway  
Las Vegas, NV 89169  
Telephone: 602-778-3700  
Facsimile: 602-778-3750

*Attorneys for Plaintiff Life Insurance Company of the Southwest*

1 Date: May 13, 2022

LAW OFFICE OF TRAVIS E. SHETLER, PC

2 /s/ Travis E. Shetler (with permission)

3 Travis E. Shetler  
travis@shetlerlawfirm.com  
4 3202 W. Charleston Blvd.  
Law Vegas, NV 89102  
5 Telephone: 702-931-9700

6 *Attorneys for Defendant Jessica Zimmerman*

7 51283927.v1-OGLETREE

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
10801 W. CHARLESTON BLVD.  
SUITE 500  
LAS VEGAS, NV 89135  
TELEPHONE: 702.369.6800

**EXHIBIT A**  
**[PROPOSED] FINAL JUDGMENT**

1

2

3

4

5

6

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

7

LIFE INSURANCE COMPANY OF THE  
SOUTHWEST,

8

Plaintiff,

9

v.

10

JESSICA N. ZIMMERMAN,

11

Defendant.

12

13

The matter came before this Court pursuant to Stipulation for Entry of Final Judgment by plaintiff Life Insurance Company of the Southwest (“LSW”) and defendant Jessica N. Zimmerman.

14

IT IS HEREBY ORDERED as follows:

15

16

1. Policy No. 720335900 (“the Policy”) issued by LSW to Zimmerman, with a January 7, 2020 Date of Issue and a Face Amount \$500,000 is hereby RESCINDED and coverage under the Policy is void ab initio.

17

18

2. Each party will bear its own attorneys’ fees and costs of suit.

19

Dated May 20, 2022.

20

21

22

23

24

25

26

27

28

Case No.: 2:22-cv-00036-JCM-NJK

**FINAL JUDGMENT**

*James C. Mahan*  
JAMES C. MAHAN  
UNITED STATES DISTRICT JUDGE

1 Presented By:

2 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

3 Ann-Martha Andrews

4 ann.andrews@ogletree.com

5 Wells Fargo Tower, Suite 1500

6 3800 Howard Hughes Parkway

7 Las Vegas, NV 89169

8 Telephone: 602-778-3700

9 Facsimile: 602-778-3750

10 *Attorneys for Plaintiff Life Insurance Company of the Southwest*

11 LAW OFFICE OF TRAVIS E. SHETLER, PC

12 Travis E. Shetler

13 travis@shetlerlawfirm.com

14 3202 W. Charleston Blvd.

15 Law Vegas, NV 89102

16 Telephone: 702-931-9700

17 *Attorneys for Defendant Jessica Zimmerman*

18

19

20

21

22

23

24

25

26

27

28